

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SHANNON PHILLIPS,	:	
	:	
Plaintiff,	:	Civil Action No. 1:19-cv-19432
	:	
v.	:	
	:	Hon. Joel H. Slomsky, U.S.D.J.
	:	
STARBUCKS CORPORATION d/b/a	:	
STARBUCKS COFFEE COMPANY,	:	
	:	FILED VIA ECF
Defendant.	:	
	:	

NOTICE OF MOTION

TO: Katherine C. Oeltjen, Esquire
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PLEASE TAKE NOTICE that on December 6, 2021, at 9:00AM, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Starbucks Corporation d//b/a/ Starbucks Coffee Company (hereinafter “Starbucks”) will move before the Honorable Joel H. Slomsky, United States District Court Judge, at the United States District Court for the District of New Jersey, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1 of the Local Civil Rules for the District of New Jersey, entering summary judgment in Starbucks’ favor. A proposed form of Order is attached hereto.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion herein, the undersigned attorneys for Starbucks will rely on the Starbucks Brief in Support of its Motion for Summary Judgment, Statement of Undisputed Material Facts and attached Exhibits, pursuant to

L. Civ. R. 56.1. Oral argument is not requested unless timely opposition is filed.

Respectfully submitted,

/s/ Hannah M. Lindgren

Richard R. Harris (*admitted pro hac vice*)

Hannah M. Lindgren (NJ No. 292082019)

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Dated: November 12, 2021

Attorneys for Defendant,

Starbucks Corporation d/b/a

Starbucks Coffee Company

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2021, the foregoing document was filed using the United States District Court for the District of New Jersey ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon all counsel of record.

s/ *Hannah Lindgren*
Hannah Lindgren